

SPC:GSG  
F.#2007R00944

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

EDUARD Z. YUSUPOV,

Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C.,  
§§ 371, 473, 2  
and 3551 et seq.)

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Deal in Counterfeit Currency)

1. In or about and between May 2006 and July 24, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant EDUARD Z. YUSUPOV, together with others, did knowingly and willfully conspire to sell, exchange, transfer and deliver false, forged and counterfeited obligations of the United States, to wit: counterfeit United States currency, with the intent that the same be passed, published and used as true and genuine, in violation of Title 18, United States Code, Section 473.

2. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendant EDUARD Z. YUSUPOV, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. In or about May 2006, within the District of New Jersey, the defendant EDUARD Z. YUSUPOV offered to sell counterfeit United States currency to another person.

b. In or about June 2006, within the District of New Jersey, the defendant EDUARD Z. YUSUPOV sold counterfeit United States currency to another person.

c. In or about and between June 2006 and July 2006, both dates being approximate and inclusive, in Staten Island, New York, the defendant EDUARD Z. YUSUPOV sold counterfeit United States currency to another person.

d. On or about July 24, 2006, in Brooklyn, New York, the defendant EDUARD Z. YUSUPOV sold counterfeit United States currency to another person.

(Title 18, United States Code, Sections 371 and 3551  
et seq.)

COUNT TWO  
(Dealing in Counterfeit Currency)

3. In or about and between June 2006 and July 2006, both dates being approximate and inclusive, within the Eastern District of New York, the defendant EDUARD Z. YUSUPOV, together with others, did knowingly and intentionally sell, exchange, transfer and deliver false, forged and counterfeited obligations of the United States, to wit: counterfeit United States currency, with the intent that the same be passed, published and used as true and genuine.

(Title 18, United States Code, Sections 473, 2 and  
3551 et seq.)

COUNT THREE  
(Dealing in Counterfeit Currency)

4. On or about July 24, 2006, within the Eastern District of New York, the defendant EDUARD Z. YUSUPOV, together with others, did knowingly and intentionally sell, exchange, transfer and deliver false, forged and counterfeited obligations

of the United States, to wit: counterfeit United States currency,  
with the intent that the same be passed, published and used as  
true and genuine.

(Title 18, United States Code, Sections 473, 2 and  
3551 et seq.)

A TRUE BILL

*Janice McElode*  
FOREPERSON

*Roslynn R. Mauskopf*  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



## INFORMATION SHEET

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

1. Title of Case: United States v. Eduard Z. Yusupov
2. Related Magistrate Docket Number(s) N/A
3. Arrest Date: N/A
4. Nature of offense(s): ☒ **Felony**  
☐ Misdemeanor
5. Related Civil or Criminal Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):  
\_\_\_\_\_
6. Projected Length of Trial: **Less than 6 weeks** ( ☒ )  
More than 6 Weeks ( ☐ )
7. County in which crime was allegedly committed: KINGS  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment been ordered sealed? ( ☒ ) Yes ( ☐ ) No
9. Have arrest warrants been ordered? ( ☒ ) Yes ( ☐ ) No
10. Is a capital count included in the indictment? ( ☒ ) Yes ( ☐ ) No

ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEYBy: Gurbir S. Grewal  
Assistant U.S. Attorney  
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